

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**DEPARTMENT OF CHILDREN  
YOUTH & FAMILIES,**  
*Plaintiff,*

**v.**

**C. A. No. 21-cv-00272 MSM-LDA**

**CARLINE VILBON,**  
*Defendant,*

**OBJECTION TO THE SUBPOENA ADDRESSED TO THE “RHODE ISLAND FAMILY  
COURT JUVENILE DIVISION KEEPER OF RECORDS” TO PRODUCE  
DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF  
PREMISES IN A CIVIL ACTION**

Now comes Rhode Island Family Court and objects to the subpoena served on or about August 5, 2021, purporting to command the production of “All docket entries, Motions, Exhibits, Transcripts, Court Decisions Court Order, Affidavits Medical records, any and all documents and information filed in Case No. PJ20-002943 and other tangible things” at the “United States District Court District of Rhode Island Office of the Clerk One Exchange Terrace, Providence, RI 02903,” “Within 20 days of service”.

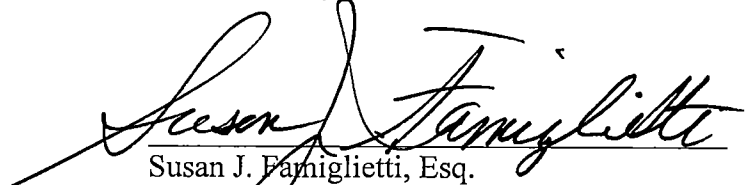
In support of this objection, the objector relies on the following.

1. The records sought in the subpoena are records of a pending Rhode Island Family Court matter statutorily protected under R.I. Gen. Laws §8-10-21 and §14-1-5 and not subject to the subpoena process.
2. The request is unduly burdensome,
3. The request was not made in compliance with Fed Rules of Civ. P. 45.

4. Any production of the requested documents would be moot as the District Courts of the United States do not have original jurisdiction over any child welfare actions pending in the Rhode Island Family Court which actions, therefore, are not removable to a federal district court.
5. Any production of the requested documents would be moot as both parties to the Family Court action identified in the "subpoena" are citizens of the State of Rhode Island therefore that action is not removable to a federal district court based on diversity of citizenship.
6. The subject matter of the request is otherwise not amenable to the subpoena process.

**WHEREFORE**, pursuant to Fed R. Civ. P. 45 (d)(2)(B) objection is hereby made to the above referenced subpoena.

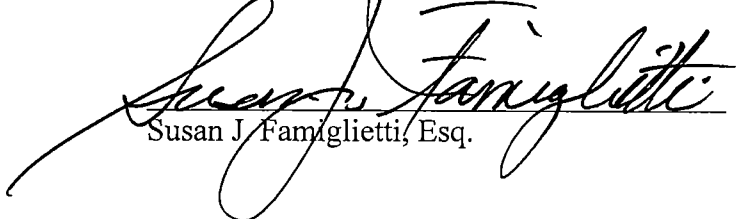
Rhode Island Family Court  
By its attorney,



Susan J. Famiglietti, Esq.  
Deputy Legal Counsel  
Rhode Island Family Court  
Garrahy Judicial Complex  
One Dorrance Plaza  
Providence, Rhode Island 02903  
401 458-5042  
[sfamiglietti@courts.ri.gov](mailto:sfamiglietti@courts.ri.gov)

CERTIFICATION

I hereby certify that a copy of this OBJECTION was served on Carline Vilbon on the 13<sup>th</sup> day of August 2021, by sending copies via e-mail to [Vilbonc@yahoo.com](mailto:Vilbonc@yahoo.com) and by United States mail, postage prepaid to 74 Prince Street, Pawtucket, Rhode Island 02860.



Susan J. Famiglietti, Esq.

## UNITED STATES DISTRICT COURT

for the

Department of Children  
Youth and Families

Plaintiff

v.

Civil Action No. 21-cv-272.

Carline Vilbon

Defendant

Service  
8/15/21SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTIONTo: Rhode Island Family Court Juvenile Division Keeper of Records  
One Dorrance Plaza, Providence, RI, 02903  
(Name of person to whom this subpoena is directed)☐ Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: All docket entries, Motions, Exhibits, Transcripts, Court Decision, Court orders, Affidavits, Medical records, any and all documents and information filed in Case No. PJ-20-002943 and other tangible things.Place: United States District Court District  
of Rhode Island Office of the Clerk  
One Exchange Terrace, Providence, RI 02903

Date and Time:

Within 20 days of  
Service☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 8/3/21

CLERK OF COURT

OR

DATE 8/15/21  
A TRUE COPY ATTEST  
VINCENT P CATAMERO  
R.I. CONSTABLE #6023

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Carline Vilbon  
74 Prince St, Pawtucket RI 02860, Vilbon@yahoo.com who issues or requests this subpoena, are:  
(401) 654-3470

## Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).